

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**BRUCE WHITE on Behalf of Himself and
All Others Similarly Situated**

Plaintiffs,

vs.

CRST, INC.

Defendant.

CASE NO. 1:11-CV-2615

UNITED STATES DISTRICT JUDGE
JAMES S. GWIN

**PRELIMINARY ESTIMATE OF
AMOUNT OF FEES AND EXPENSES**

The following is a preliminary estimate of the Plaintiffs' attorneys' fees and costs associated with a final disposition of the above-styled class action complaint submitted pursuant to the Court's Case Management Conference Scheduling Order (Doc. 12).¹

<u>ATTORNEY'S FEES</u>		<u>COSTS</u>	
Preliminary Investigation and Filing Complaint	\$ 15,000.00	Deposition	\$25,000.00
Procedural Motion Practice	\$ 10,000.00	Experts	\$20,000.00
Discovery	\$300,000.00	Witness Fees	\$ 5,000.00
Dispositive Motion Practice	\$ 10,000.00	Juror Fees	\$ 2,000.00
Settlement Negotiations	\$ 15,000.00	E-Discovery	\$50,000.00
Trial	\$175,000.00	Class Administration	\$40,000.00
Class Administration ²	\$260,000.00		
TOTAL FEES	\$785,000.00	TOTAL COSTS	\$142,000.00

¹ The fees and costs expressed herein are based on an initial assumption that the putative class and subclasses alleged in the Class Action Complaint are comprised of approximately 3,000 individuals. The undersigned counsel recently resolved a similarly-sized class in *Hall, et al. v. Vitran Express, Inc.*, N. D. Ohio Case No. 1:09-cv-00800-DAP (Doc. 55), which was used to calculate the anticipated fees and costs herein.

² In the event a class is certified, counsel anticipates receiving and processing voluminous communications from putative class members inquiring as to the nature of any resolution, timing and amount of any payment, and general concerns about class action litigation. While many of these inquiries can be handled through a third-party administrator, counsel remain extensively involved in the administration process.

Respectfully Submitted,

STUMPHAUZER, O'TOOLE, McLAUGHLIN,
McGLAMERY & LOUGHMAN CO., LPA

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Counsel for Plaintiff and the putative class

CERTIFICATE OF SERVICE

I HEREBY CERTIFY THAT on February 23rd, 2012, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system which will send a notice of electronic filing to the following:

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